

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

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BRENNAN M. GILMORE,	)	)
	)	)
Plaintiff,	)	)
	)	)
v.	)	No. 3:18-cv-00017-NKM-JCH
	)	)
ALEXANDER E. (ALEX) JONES, <i>et al.</i> ,	)	)
	)	)
Defendants.	)	)
	)	)
	)	)

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**[PROPOSED] SCHEDULING ORDER**

WHEREAS, the Court entered on February 22, 2022 a scheduling order to govern the remainder of this litigation with a trial date set for January 17-20 and January 23-27, 2023 (D.I. 475);

WHEREAS, the remaining parties to this action seek additional time to resolve discovery issues and schedule depositions;

NOW, the parties come jointly before this Court to submit the following amended proposed schedule for deadlines that shall control the remainder of this action.

<b>Event</b>	<b>Proposed Dates</b>	<b>Proposed Date</b>
Deadline to complete fact discovery depositions	April 11, 2022	May 9, 2022
Potential settlement / ADR discussion	April 18, 2022	May 16, 2022
Fed. R. Civ. P. 26(a)(2)(B) opening expert reports	April 25, 2022	May 23, 2022
Fed. R. Civ. P. 26(a)(2)(B) responsive expert reports	May 20, 2022	June 17, 2022

<b>Event</b>	<b>Proposed Dates</b>	<b>Proposed Date</b>
Fed. R. Civ. P. 26(a)(2)(B) reply expert reports (limited to subject matter first raised in responsive reports)	June 10, 2022	July 8, 2022
Deadline to complete all discovery, including expert depositions.	June 27, 2022	July 20, 2022
Deadline to file dispositive motions	August 5, 2022	Unchanged
Deadline to file oppositions to dispositive motions	September 13, 2022	Unchanged
Deadline to file replies to dispositive motions	October 14, 2022	Unchanged
Deadline for hearing dispositive motions	TBD by the Court	Unchanged
Exchange list of witnesses expected to be called at trial	November 11, 2022	Unchanged
Deadline for filing motions <i>in limine</i> (copies to opposing counsel)	December 2, 2022	Unchanged
Deadline for filing oppositions to motions <i>in limine</i> (copies to opposing counsel)	December 21, 2022	Unchanged
Deadline for filing proposed jury instructions and special interrogatories (copies to opposing counsel)	January 10, 2023	Unchanged

Event	Proposed Dates	Proposed Date
<p>Deadline for filing joint pretrial order including:</p> <ul style="list-style-type: none"> <li>• any contested issues of law that require a ruling before trial;</li> <li>• the essential elements that a party must prove to establish any meritorious claims remaining for adjudication, and the damages or other relief sought;</li> <li>• the essential elements that a party must prove to establish any meritorious defenses;</li> <li>• the material facts and theories of liability or defense;</li> <li>• the issues of fact contested by each party;</li> <li>• any contested issues of law that do not require a ruling before trial;</li> <li>• any stipulations; and</li> <li>• any special voir dire questions</li> </ul> <p>**Disputed sections to be filed as separate addendum**</p>	January 10, 2023	Unchanged
Pretrial conference	TBD by the Court	Unchanged
Trial	January 17-20 and January 23-27, 2023	Unchanged

SO ORDERED: \_\_\_\_\_

By: \_\_\_\_\_  
The Honorable Joel C. Hoppe

Dated: April 4, 2022

Respectfully Submitted,

By: /s/ Hassen A. Sayeed

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of April 2022, a copy of the Proposed Scheduling Order was served on all parties via the Court's Electronic Case Filing system, and separately sent via electronic mail to Mr. Lee Stranahan and Mr. R. Scott Creighton.

/s/ Hassen A. Sayeed  
Hassen A. Sayeed